

FILED

**UNITED STATES DISTRICT COURT
Eastern District of Virginia
Alexandria Division**

2017 JUN 26 A 9 59

BRIAN C. DAVISON

Plaintiff,

v.

**LOUDOUN COUNTY BOARD OF
SUPERVISORS, ET. AL.,**

Defendants.

**CLERK US DISTRICT COURT
ALEXANDRIA, VIRGINIA**

**Case No.: 1:16-CV-932
(JCC/IDD)**

**PLAINTIFF'S MOTION FOR LEAVE TO FILE ELECTRONIC EXHIBITS
SUBMITTED DURING THE MAY 16, 2017 TRIAL**

COMES NOW the Plaintiff, Brian C. Davison ("Davison"), and respectfully requests leave of This Court to file electronic versions of the trial exhibits submitted during proceedings on May 16, 2017. The proposed DVD includes the following:

- a. Exhibits 1-99: Selected exhibits from this list were submitted at trial:
 - i. Newsletters, in portable document format (PDF), promulgated by the office of Defendant Randall (Exhibits 17-31) and hosted on the Loudoun County website were admitted as Exhibits 17-31. Each newsletter contains an active Facebook "f" icon at the bottom which links to the "Chair Phyllis J. Randall" Facebook page when clicked.
 - ii. Exhibit 2 labeled "lcps_41de85af-4e4c-45d4-8937-b24d62615ac6.mp4": the LEAP town hall video from February 3, 2016, downloaded from the LCPS website, was played and admitted during the trial.

- b. Exhibits 101-199: posts from the “Chair Phyllis J. Randall” Facebook page (all exhibits are prefaced with their exhibit number and a timestamp YYYYMMDD indicating the day on which the post was made)

During the May 16, 2017 trial, the Plaintiff requested to provide, and the court agreed to receive, copies of the electronic exhibit files including the video of the February 3, 2016 Loudoun Educational Alliance of Parent (LEAP) town hall event and electronic portable document format (PDF) versions of Defendant Randall’s newsletters linked to her “Chair Phyllis J. Randall” Facebook page. Pursuant to the Alexandria Division’s “Clerk’s Office General Filing Tips” #17 (<http://www.vaed.uscourts.gov/resources/alexandriahints.html>), Plaintiff requests leave of This Court to submit the DVDs containing the above-referenced exhibits in their electronic format. Plaintiff has discussed this filing previously with the Defendants and is providing an identical DVD to counsel.



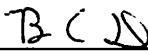
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CERTIFICATE OF SERVICE

I declare under penalty of perjury that no attorney has prepared, or assisted in the preparation of this document.

I hereby certify that on the 26th day of June, 2017, a true copy of the foregoing pleading, and the proposed DVD, was mailed to the law office of counsel for the Defendants. The pleading was also filed in person with the Clerk of Court and Defendants' counsel will receive a copy via PACER.

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